

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IMPERIUM IP HOLDINGS (CAYMAN), LTD.,)	
)	
Plaintiff and Counterclaim Defendant,)	
)	Case No. 4:14-cv-00371
v.)	
)	
SAMSUNG ELECTRONICS CO., LTD.,)	
SAMSUNG ELECTRONICS AMERICA, INC.,)	
SAMSUNG TELECOMMUNICATIONS)	JURY TRIAL DEMANDED
AMERICA, LLC, AND SAMSUNG)	
SEMICONDUCTOR, INC.)	
)	
Defendants and Counterclaim Plaintiffs.)	

**DEFENDANTS' SECOND OPPOSED MOTION TO CONTINUE TIME TO RESPOND
TO CURRATIVE INSTRUCTION**

Defendants respectfully file this Second Opposed Motion to Continue the time to file its Response to Currative Instruction. Defendants respectfully show the Court as follows:

Defendants have filed and served their Submission Regarding Discovery Issues. However, despite Defendants' best effort and good faith, in order to provide the Court with a substantive response, Defendants was unable to file before 9:35 p.m. The attached response required a Declaration from Jun H. Bang who is at the center of the discovery issues which involves the circumstances surrounding his document production. Mr. Bang is located in South Korea, which poses logistical difficulties especially given time differences. Defendants request leave of Court to file the subject submission. This request is not for the purpose of delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant Samsung requests that the deadline to file its Submission Regarding Discovery Issues be continued to 9:35 p.m.

Respectfully submitted,

Dated: February 4, 2016

By: /s/ Clyde M. Siebman

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Ltd., Samsung Electronics America, Inc., and
Samsung Semiconductor, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that on this 4th day of February, 2016, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ Clyde M. Siebman
Clyde M. Siebman

CERTIFICATE OF CONFERENCE

The undersigned certifies that on the 4th day of February, 2016, Counsel for Defendant Samsung contacted Counsel for Plaintiff Imperium regarding a Motion for Continuance. Counsel of record stated that they oppose the Motion to Continue for filing after 9:00 p.m.

/s/ Clyde M. Siebman
Clyde M. Siebman